# OSBE Special Meeting 11.12.20





# Investigative Audit – Epic Charter Schools

- 10.1.20 OK State Auditor and Inspector released an audit of Epic Charter Schools
- 10.12.20 State Board meets and issues demand pursuant to 70 O.S. Section 18-118 for return of \$11M within 60 calendar days of Epic receiving relevant work papers
- 10.13.20 Statewide Virtual Charter School Board votes to initiate termination of Epic One-on-One
- 10.20.20 State Board demand letter sent to Epic



# Oklahoma Cost Accounting System (OCAS)



### **OCAS – 70 O.S. Section 5-135**

- OCAS is a system of codes for initiating, recording and paying for all purchases and obligations, and then for recording revenues and expenditures of school districts.
- Each board establishes adequate procedures and controls for purchases and obligations
  - Invoices
  - Purchase orders
  - Authorized persons to purchase
  - Approval of all transactions after ascertaining proper accounting and process is followed
- School districts are required to use the accounting systems approved by the State Board of Education to be in compliance.



### **OCAS – 70 O.S. Section 3-136**

- Requires charter schools to "prepare a statement of actual income and expenditures" for the fiscal year that ended on the preceding June 30.
- Requires the statement of expenditures to use OCAS codes as defined in rules of the Board.
- Prohibits charter schools from submitting estimates of expenditures or prorated amounts to meet the requirements.



### OCAS - 70 O.S. Section 5-135.2

- Requires all districts to enter prior year's actual revenue and expenditures by September 1, through OCAS.
- Districts may begin submission on July 1; upload trial data at any time
- Administrative rules formerly provided an opportunity for districts to review their September 1 submissions until December 15. After December 15, no changes could be made to the data by the school or OSDE.
- Why December 15 and no changes? Transparency Index and federal reporting
- OSDE passed emergency rules in April to change this process.



I hereby certify to the best of my knowledge and belief, the data reported constitutes an accurate and full report of all revenues and expenditures during the previous fiscal year under OAC.....I understand this data will be used for many purposes, including....reporting to state legislature, USDE....I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise.

Pending Precertification. Click to show less		
Your uploads have been certified by the OCAS staff.		
210 25-5-4 and OAC 210 25-7-1. I understand this data will be used for many purposes, including but not limited to, re	belief, the data reported constitutes an accurate and full report of all revenues and expenditures during the previous fiscal year under OAC eporting to state legislature, USDE, and in the calculation of your district's Maintenance of effort and any penalties in accordance with the may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (Est)	
Enter Your Initials:  I have reviewed the District Maintenance of Effort Special Ed Report and the information is correct.  I have reviewed the Administrative Cost Details Report and the information is correct.  I have reviewed the Excess Cost Report 2014 and Later By District Report and the information is correct.  I have reviewed the ESSA Maintenance of Effort calculation in the OCAS manual.	OCAS Admin - Uncertify These Uploads Uncertify button only seen by OCAS Admins	
Superintendent - Certify These Uploads		



# **Epic OCAS Compliance**

- Year over year, Epic uploads information for the first time on or near September 1. Schools may begin uploading July 1 for the prior fiscal year. Epic One on One OCAS activity:
  - 2016 37 uploads on Sept 1, none prior; 10 uploads on Dec 15, no activity in between
  - 2017 41 uploads on Aug 31/Sept 1, none prior
  - 2018 10 uploads on Aug 29/Sept 2; 5 uploads on Dec 16
  - 2020 2 uploads Aug 27 with 1068 errors; 21 uploads Aug 30/Sept 1
- Epic Blended presents a similar pattern.



Epic One on One			20	016		
Epic one on one	E	xpenditure			Revenue	
			Number of			Number of
	Date	Errors	Uploads	Date	Errors	Uploads
Uploaded	9/1/2016	195	37	8/6/2016	2	4
Uploaded	12/15/2016	4	10	12/15/2016	o	2
Locked	9/1/2016					
Certified	12/15/2016		(*)			
	: E			17	Darraner	
	E	kpenditures	Number of		Revenue	Number of
	Date	Errors	Uploads	Date	Errors	Uploads
Uploaded	8/31/2017	271	4	8/25/2017	0	1
Uploaded	9/1/2017	191		11/14/2017	o	1
Uploaded	11/15/2017	4	7	, _ ,,,		
Locked	9/1/2017					
Certified	11/15/2015					
			20	18		
	E×	penditures			Revenue	
			Number of			Number of
	Date	Errors	Uploads	Date	Errors	Uploads
Uploaded	9/4/2018			7/23/2018	1	1
Uploaded	12/6/2018	O	2	8/26/2018	O	1
Uploaded				9/4/2018	2	2
Uploaded				12/6/2018	O	1
Locked	9/4/2018					
Certified	12/6/2018					
			20:	10		
	Ev	penditures	20.	13	Revenue	
		70	Number of		Revende	Number of
	Date	Errors	Uploads	Date	Errors	Uploads
Uploaded	8/29/2019	880	. 6	8/18/2019	О	1
Uploaded	9/2/2019	219	4	12/9/2019	O	1
Uploaded	12/16/2019	194	5	12/12/2019	O	1
Locked	9/3/2019					
Certified	12/16/2019					
	12, 10, 2013					
			202	20		
	Ex	penditures			Revenue	
	100		Number of		_	Number of
Uploaded	Date 8/27/2020	Errors 1068	Uploads 2	Date	Errors 1	Uploads
Uploaded	8/30/2020	540	10	8/15/2020 9/27/2020	127	1 3
Uploaded	9/1/2020	197	11	9/29/2020	127	0
Uploaded	9/30/2020	14	5	9/3/2020	1	0
		~	3	2,2,2020		
Locked	9/1/2020					
Certified	9/30/2020					



# 2016 Epic OCAS Submission

- September 1: 37 uploads
- December 15: 10 uploads, including reclassifying \$2.4M
- New "edit checks" are periodically implemented after reviewing prior year OCAS submissions and noting the use of problematic coding combinations.
- An edit check produces an error if certain OCAS codes are used together. Currently, 404 edit checks exist.



# 2016 Epic OCAS Submission

- A new edit check in 2016 prohibited the 2321-320 coding combination, which resulted in the One-on-One submission being flagged as improper.
  - Function 2321: Office of Superintendent; Object 320: Professional-Education services
- Edit checks are created well before the reporting deadline.



### 2017 - OCAS

August 31: 4 uploads, 271 errors

September 1: 37 uploads, 191 errors



# Monday, August 28, 2017

- Email from OSDE to Epic: "As of today our records show that your district's FY17 OCAS expenditure and Revenue records are not locked." (no response)
- August 31: "Second Notice" (no response)
- September 1: No submission as of 3:30 p.m.

From: Iona Martin

Sent: Monday, August 28, 2017 10:09 AM

To: josh.brock@epiccharterschools.org; david.chaney@epiccharterschools.org Subject: SDE; FY17 OCAS Expenditure and Revenue Submission Due September 1, 2017

As of today our records show that your district's FY17 OCAS Expenditure and Revenue records are not locked. As required by Title 70, Chapter 1, Section 5-135.2 "No later than September 1 each year, every school district shall transmit a copy of the income and expenditures data required pursuant to subsection C of this section to the State Department of Education."

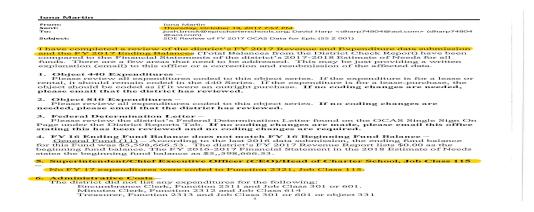
If I can provide any assistance please let me know.





# Thursday, October 19, 2017

- OSDE completed a review of Epic's FY17 Revenue and Expenditure data submission
- 9 categories need to be addressed; have errors. Categories include:
  - Administrative Costs
  - No expenditures to Superintendent
  - Fund balances
- Response requested by 10/30; Epic responded on 11/15; OSDE had more questions and information was still missing



### Auditor, Function 2318, object 331

7. State Allocated Programs — Please review the district's FY 17 OCAS Compared to State Aid Allocation report found on the District Reports Tab and the FY 16 OCAS Compared to State Aid Allocation report found on the Projects 311, 312, 361 and 367 ended FY 17 with balances

Project	SDE	OCAS	Difference
511	\$ 814,411.70	\$ 1,249,206.55	\$ (434,794.85)
515	\$ -	\$ 20,600.00	\$ (20,600.00)
541	\$ 115,137.79	\$ 104,447.38	\$ 10,690.41
621	\$ 656,760.10	\$ 713,929.95	\$ (57,169.85)

9. OCAS Balance with Estimate of Needs in all Funds — The FY 2017 Ending Balances (Total Balances from the District Check Report) have been computed district's 2017-2018 Estimate of Needs for all funds. The following funds do not balance:

201 201 2021						
General (3.3)	i ke	OCAS		EON		Difference tween OCAS and EON
FY16 Ending Fund Balance	8	5,598,666.53	100	result of further than the server	15193	Track to the second part of the
Begin (6110-Dist Rev Rpt)	s		5	5,598,666.53	\$	(5,598,666.53)
Lapsed (6180-Dist Rev Rpt)	S	86,429.81	\$	86,440.06	8	(10.25)
Estopped (6140-D(st Rev Rpt)	S	96,144.01	9	363		95,144.01
Total Revenue from EON	3 2 3 3 5 1 B	The state of the state of the state of	\$	47,085,896.29	197 000	CONTRACTOR STATES AND ADDRESS.
New Revenue (FY17 Dist Check Rpt)	\$ 4	1,400,789.70	\$	41,400,789.70	s	0.00
5111-5113 (FY17 Dist Check Rpt)	- 3	-	\$	Au-	~	and a
5120-5190 (FY17 Dist Check Rpt)	-		200		\$	-
Warrants + Encumber		0,102,006.58	8	40,105,202.53	.5	(3,195.95)
End	2.	1,481,356.94	- 22	6,980,693.76	1 = 1	(5,499,336.82)

The district's records are now open for submission of the corrected data. Please take the appropriate action and respond to this office by Monday, October 30, 2017). If you have any and attention to this important process.



# Thursday, October 24, 2017

- Questions and corrections to OCAS data
- OSDE offers in-person assistance across 4 days
- No response to offer

### Iona Martin

iosh.brock@epiccharterschools.org Subject

OSDE: FY17 OCAS Data Review - In person training

10/26/2017 10:00 - 12:00 1:00-3:00 10/27/2017 9:00 - 11:00 1:00-3:00 10/30/2017 8:00-10:00 1:00-3:00 10/31/2017 1:00-3:00

If you are interested in attending please respond to this email with your preferred date and time. Since this is a first come first serve opportunity please indicate 3 choices. Encumbrance Clerks and Treasurers can earn continuing education points for each hour of attendance,

Please print each of the following reports along with your 2017-2018 Estimate of Needs and the email received

District Review Sheet District Expenditure Report District Revenue Report District Maintenance of Effort Special Ed Expenditure Comparison Report Revenue Comparison Report District Check Report Superintendent SPR Comparison Report Administrative Cost Details OCAS Compared To State Aid Allocations Federal Determination Letter 2017-2018 Estimate of Needs

We look forward to seeing you.

Katherine Black, Executive Director Financial Accounting/OCAS/Audits Iona Martin, Financial Specialist-Auditing Kelly Freeman, Financial Specialist-Auditing



### **Communication Post 2017 Deadlines**

- Deadline 12/15 to certify all actual revenue, expenditure data for the prior year
- Dec 20: Epic asked to meet OSDE to "make sure coding is correct from the start"
- 2018: Epic coded expenditures to unaccredited sites; OCAS data cannot be changed

### lona Martin

From: Iona Mai

Sent: Wednesday, December 20, 2017 10:38 AM

To: Katherine Black; Pam Honeysuckle

Subject: Meeting with Epic Blended

David Harp called and confirmed the meeting for Tuesday, January 9, at 10 am. It will be David, Josh Brock and possibly one other person. They just want to visit with this office to make sure coding is correct from the start.

Iona Martin

Financial Specialist

Financial Accounting / OCAS

Oklahoma State Department of Education

2500 North Lincoln Boulevard, Room 4-20

Oklahoma City, Oklahoma 73105-4599

Telephone: 405-522-3272 Fax: 405-522-3271

Iona.Martin@sde.ok.gov

### Inna Martin

From: Josh Brock «josh brockiff-epiccharterschools.org» Seet: Friday, April 20, 2018 3:07 PM

eest: Friday, April 20, 2018 3:0

Subject RE: FY 17 Expenditures

Please find attached

anaces,

From Iona Martin Imalitoclona Martin@ade.ok.as

est: Thursday, April 19, 2018 10:07 AM

ubject: FY 17 Expenditures

The attached spreadsheet shows the expenditures that are coded to site codes that are not the accredited for the District. Please list the accredited site code by each line. The FY 17 records

Please contact me if you have any questions.

Thank you.

Jona Martin

Financial Specialist

Financial Accounting / OCAS

Oklahoma State Department of Education 2500 North Lincoln Boulevard, Room 4-20

Oklahoma City, Oklahoma 73105-4599 Telephone: 405-522-3272

Fax: 405-522-3271 Iona Martin@sde.ok.gov



## 2018 - OCAS



# September 2018

- Deadline Sept 4
- Sept 4 OSDE to Epic: data has not been uploaded or locked; please provide
- 25 uploads; 373 errors
- Sept 11 OSDE: reviewed data, questions identified
- No response from Epic

### Pam Honeysuckle

From Sent: To: Pam Honeysuckle Tuesday, September 04, 2018 8:15 AM

'josh.brock@epiccharterschools.org'

Subject:

District FY 18 OCAS Data EPIC Charter and Epic Blended

I have noticed that the district has not uploaded the OCAS data, has errors or has not been (locked (a statement of actual income and expenditures of the district for the fiscal year, 18). Please upload the OCAS data and lock by close of business today.

### Please remember the following:

No later than September 1 each year, every district board of education shall prepare a statement of actual income and expenditures of the district for the fiscal year that ended on the preceding June 30. The statement of expenditures shall include functional categories as defined in rules adopted by the State Board of Education to implement the Oklahoma Cost Accounting System pursuant to Section 5-135 of this title.

No later than September 1 each year, every school district shall transmit a copy of the income and expenditures data required pursuant to subsection C of this section to the State Department of Education. The Department shall post the income and expenditure data on the Internet web site for the Department in a form that is accessible to the public. (70-5-135.2)

Beginning July 1, 1991, and in each subsequent school year, the State Department of Education shall reduce the monthly payment of a district's State Aid funds if, at the time of such payment, the district is not operating pursuant to the Oklahoma Cost Accounting System. The amount of the reduction shall be one percent (1%) for the first payment, two percent (2%) for the second payment, three percent (3%) for the third payment, four percent (4%) for the fourth payment, and five percent (5%) for each subsequent payment. (70-5-135.2)

### Respectfully,

Pam Honeysuckle, Financial Specialist Financial Accounting Oklahoma State Department of Education 2500 North Lincoln Blvd., Suite 420



### November – December 2018

- Nov 2 OSDE to Epic: "the OCAS data has not been corrected and responses [have] not been received."
- Dec 6 OSDE: "figures are not going to change when nothing has been uploaded since September 4, 2018."



rom: Sent: Fo: Cc: Subject:	Thursday, D Pam Honey	david.chaney@epicchart	M	
Just to confirm, t	he Epic Blended data is c	onsidered complete as	we submitted. Is that correct	3
Thanks,				
Josh		*		
On Thursday, De	cember 6, 2018, Pam Ho	neysuckle < <u>Pam.Honey</u>	suckle@sde.ok.gov≥ wrote	
Josh,				
18 and my first i	d not change. The figures review was on 9-10-18. I vill locked for the district	have attached the lates	ge when nothing has been up t review. Please correct the made.	data today by
18 and my first r 3:30. The data v	eview was on 9-10-18. I	have attached the lates	t review. Please correct the	data today by
18 and my first a 3:30. The data v	eview was on 9-10-18. I	have attached the lates if the changes are not	t review. Please correct the made.	data today by
18 and my first r 3:30. The data v	eview was on 9-10-18. I	have attached the lates	t review. Please correct the made.	data today by
18 and my first r 3:30. The data v	eview was on 9-10-18. I	have attached the lates if the changes are not	t review. Please correct the made.	data today by
18 and my first a 3:30. The data v	eview was on 9-10-18. I	have attached the lates if the changes are not	t review. Please correct the made.	data today by
18 and my first r 3:30. The data v	eview was on 9-10-18. T	have attached the lates if the changes are not	t review. Please correct the	data today by
18 and my first a 3:30. The data v	eview was on 9-10-18. T	have attached the lates if the changes are not	t review. Please correct the made.	data today by
18 and my first a 3:30. The data v	eview was on 9-10-18-1 vill locked for the district	have attached the lates if the changes are not	treview. Please correct the made.	data today by
Respectfully, Pam Honeysuck Financial Accou	eview was on 9-10-18-1 vill locked for the district	have attached the lates if the changes are not	treview. Please correct the made.	data today by
Respectfully,  Pam Honeysuck Financial Accou	eview was on 9-10-18. I will looked for the district	have attached the lates if the changes are not	treview. Please correct the made.	data today by
Respectfully,  Pam Honeysuck Financial Accou	eview was on 9-10-18. I vill locked for the district le, Financial Specialist nting Department of Education coln Blvd., Suite 420	have attached the lates if the changes are not	treview. Please correct the made.	data today by
Respectfully,  Pam Honeysuck Financial Accou Oklahoma State 2500 North Linc Oklahoma City,	eview was on 9-10-18. I vill locked for the district le, Financial Specialist nting Department of Education coln Blvd., Suite 420	have attached the lates if the changes are not	treview. Please correct the made.	data today by

### 2019 - OCAS

August 29: 6 uploads, 880 errors

September 2: 4 uploads, 219 errors

December 16: 5 uploads, certified within final hour



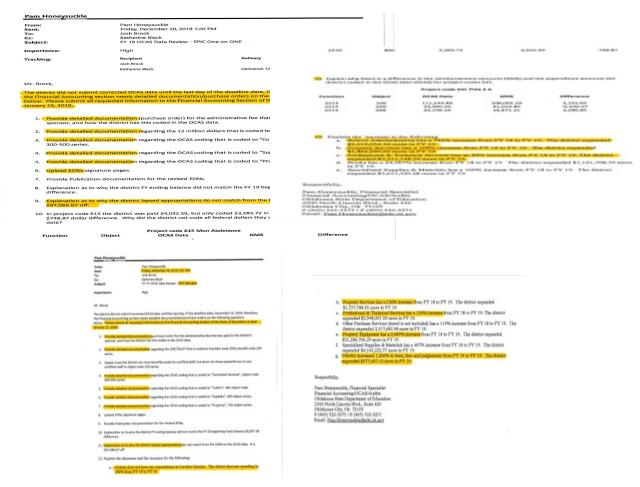
# Monday, December 16, 2019

- Deadline day, OSDE to Epic: "have to have responses to questions I have asked"
  - OCAS/School Personnel conflict
  - No employees reported for Blended;
     100% decrease from prior year repo.
  - Site codes are not correct
  - Lapsed appropriations
  - Documentation on 10% mgmt fee
- Epic responds to some questions, says correcting other information
- OSDE: "This has to be completed today"
- Epic certifies just before 5:00



# Friday, December 20, 2019

- Epic did not submit corrected OCAS data until the deadline, Dec 16
- OSDE request for detailed documentation/purchase orders on the following questions below
- 29 questions b/w One-on-One and Blended
- Responses due no later than January 15, 2019.





# Friday, February 7, 2020

- Epic requests meeting to discuss HB 1395 coding
- OSDE: please be prepared to discuss the 29 questions from Dec 20
  - Management fee documentation
  - School personnel
  - Site codes
  - Documentation on \$12M coded to 5800
  - Documentation on Contracted Services
  - Documentation on Supplies
  - Documentation on Property
  - Explanations for coding





# Meeting – February 10, 2020

### MEETING WITH EPIC

Meeting took place on 2-10-2020 @ 1:00pm.

Reason of Meeting: New Object Codes and FY 19 OCAS Data

In Attendance at Meeting:

Kathy Black
Josh Brock
David Harp
Pam Honeysuckle
Lori Murphy

### Discussion:

- How to code the OCAS data with new object codes (EPIC Youth Services paying all purchase orders).
- How to split PO between EPIC One On One and EPIC Blended.
  Should not be a percentage, but rather, each district pay for their own items.
- Districts should be treated as separate entities

  Districts should have their Tax Payer Identification Number
- FY 20 OCAS Data Payroll for EPIC Blended
  Should be to appropriate function code but for FY 20 could use object code 591
  (Services Purchased from another LEA or Educational Services Agency within the State).
- Oistricts had multiple coding errors

  At the close of FY 19 OCAS Data EPIC One had a Admin Cost Penalty

  (District stated that was coding error related object code 733)
- Districts Uploading OCAS Data for FY 19

  District did not upload trial data and did not upload very much for review process to take place, because the expenditure data that was upload was never locked back until 12-16-19 which was deadline date. This was the case for both districts.
- FY 20 OCAS Data

  Encouraged the district to upload trial OCAS data (January 15 June 30, 2020) to help
  with any coding they might need help with regarding the new object code.
  Encourage the district to upload actual data earlier (July 1 September 1) for an easier
  review process in order to help the districts with coding and reports.
- FY 2021 OCAS Data for EPIC Blended Should have proper payroll codes in FY 21 OCAS data (Object Codes 100 & 200 Series) Again both district should have their own Tax Payer Identification Number



# **Separate Entities**

- Separate charters
- Separate sponsors
- Separate governing board
- Separate county-districtsite code
- Separate audits
- Separate DUNS Number

- 2018 separate payroll and reporting (audit p. 41)
- 2019
  - Teachers Retirement: "false information" when One submits for Blended
  - OSDE: Federal Programs monitoring
- 2020



# Epic's Response (2.11.20 & 2.21.20)

- Revenue is received and deposited in separate bank accounts – clear and distinct;
- Payroll options to be for 2021;
- Request meeting in late March or April to revisit items from Feb 10 meeting
- Below items and attachment responds to questions 2, 3, 6, 7 and 12e (from Dec 20 email)
- "much of the dollars coded to 733 should have been coded to certified salaries"
- Epic Blended does not run a payroll and has no employees, per se;
- Blended provides reimbursement to One-on-One and codes this as 5800



Pam Honeysuckle	
From:	Josh Brock ≼josh.brock@epiccharterschools.org>
Sent:	Friday, February 21, 2020 12:52 PM
To:	Pam Honeysuckle
Cc: Subject:	Katherine Black; David Harp [External] Epic Blended
Attachments:	External ppic blended Blended Question 2.pdf
Pam:	
2020. David Harp has been have been dealing with sev per my call with Kathy on T submission for Epic Blende	phone and over email over the last month and also had a meeting on February 10. In dealing with he mother's health decline and ultimately her passing this past week, and I weral things as well from a bandwidth perspective, so we appreciate your patience with us. As fuseday, February 18, 2020, frim responding in part to your request regarding our OCAS (and the control of the cont
such, it has no employees p	n in our meeting on February 10, 2020, Epic Blended currently does not run a payroll, and as per se. It does provide reimbursement to Epic One. <mark>The below response coupled with the</mark> rs questions 2, 3, 6, 7, and 12e.
bill, as we articulated in ou attached that these vendo issue we discussed in perso actually uploaded our Blen not catch this as a majority the 2019-2020 school year, mathedology through the least of the second second person that the second	y, when we receive bills from insurance companies (Worker's Compensation), we process the ir meeting, out of both entitles proportionally to student count. You will notice in the is paid are insurance companies. As it relates to the other questions, they all tie back to the notice of the science to a second to 23 should have been coaled to retrified salaries. We will not be supported by the second to 23 should have been coaled to retrified salaries. We will go of the Epic Blended reimbursement to Epic One should have been to certified salaries. For the discussions had between Mr. Harp, Katthy, you, and Lori focused on maintaining this balance of the FY2020 school year. We will be providing more response that relating but e over to you as we spent a great deal of time discussing in our meeting and helping everyone.
Thank you very much again	n, Pam.
Sincerely,	
daol	
Pam Honeysuckle	
From:	Jash Brock <josh.brock@epiccharterschools.org></josh.brock@epiccharterschools.org>
Sent:	Friday, February 21, 2020 1:18 PM
To:	Pam Honeysuckie
	Katherine Black: David Harp
Cc:	Katherine Black; David Harp Enternall Exic One
Subject:	External Epic One One on One Question 2.pdf
Attachments:	One on One Question 2.por
Parm:	
2020. David Harp has be have been dealing with a per my call with Kathy o submission for Epic One.	se phoce and over email over the last month and also had a meeting on February 1.0, een dealing with his mother's health decline and ultimately her passing this past week, and it several things as well from a bandwidth perspective, so we appreciate your partience with us. As in Tuesdey, February 18, 2020, im responding in part to your request regarding our OCKS I'm also saking that we establish a meeting for late March or early April to revuls some ferms y 10, 2020 meeting. Lastly, we really appreciate the collaboration that has occurred over the
such, it has no employee attached document answ	ain in our meeting on February 10, 2020, Epic Blended currently does not run a payroll, and as es per se. It does provide reimbursement to Epic One. The below response coupled with the weers question 2. We had also previously responded and provided the Estimate of Needs for igned by the board. We code payments received by One on One from Epic Blended to source d.
Thanks so much, Pamil	
Thanks,	
Josh	



# Non-Responsive

- Documentation for:
  - Management fee (10% Epic Youth Services, LLC)
  - Contracted Services
  - Tuition expenses
  - Property
  - \$12M coded to 5800
- Lapsed appropriations do not match
- Separate entity, reporting and operating

- Increases and decreases from prior year
  - Certified salaries decreased 100% at Blended
  - Property services went up 126%
  - Prof services increased 124%
  - Other non-travel services up 110%
  - Specialized Supplies and Materials increased 407%
  - 1266% increase in dues, fees and judgments



### 2020 - OCAS

August 27: 2 uploads, 1068 errors

August 30: 10 uploads, 540 errors

September 1: 11 uploads, 197 errors



# House Bill 1395 (2019)

- Requires "the total amount paid to an [EMO] as well as itemized expenditure information for the goods or services provided by the management organization" to be reported through OCAS, using appropriate codes
- Owner of a management organization must disclose to governing board in open meeting an ownership position in any business that contracts with the school
- Effective July 1, 2019 for the 2019-2020 school year
- Data is not reported under these rules until Fall, 2020



# 2020 Epic HB 1395 OCAS Submission

- Epic Certified 9.30.20
- \$519,000 Management Services v. \$759,000 Advertising
- Sample invoice from March 20, 2020
- Request source documents for "Certified Salaries"
- "None of your business"
- Supplanting?
- Purchase orders
  - "000000" as code identified
  - Blanket
  - No board approval
- Unable to validate services being paid for



QTY	ITEM#	DESCRIPTION	JOB	UNIT PRICE	LINE TOTAL
1		Certified Salaries		\$6,333.05	\$6,333.05
		Advertising		\$16,449.49	\$16,449.49
		Travel		\$4,934.85	\$4,934.85
		Other Technical Services		\$20,068.38	\$20,068.38
		Accounting Services		\$7,402.27	\$7,402.23
		Non-Certified Salaries		516,449.49	\$16,449.49
		Technology Services		\$352,594.80	\$352,594.80
		Data Processing		\$40,959.23	\$40,959.2
1		Management Services		\$14,393.30	\$14,393.30
		Professional Education Services		\$41,123.72	\$41,123.7
1		Rental Services	}	\$4,112.37	\$4,112.3
		Land & Building Rental		\$16,449.49	\$16,449.4
1		Construction Services		\$12,337.12	\$12,337.1
1		Food Service Management		\$2,056.19	\$2,056.1
				SUBTOTAL	\$555,663.7
				SALES TAX	
				TOTAL	\$555,663.7

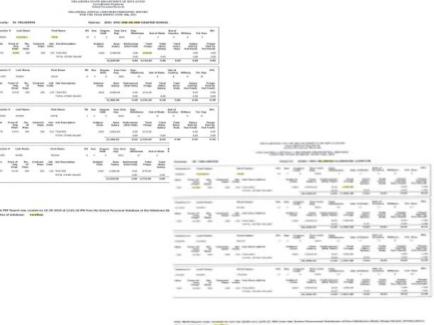


# **School Personnel Reporting**



- School Personnel Report
  - 0 support employees at Epic Blended
  - Certified employees are all reported as 61% Oneon-One and 39% Blended
  - Not one employee reported full-time at either school
  - Certified employees reported at Blended; however, Flexible Benefit Allowance (FBA) report
    - 0 certified employees at Blended
- FBA state apportionment is \$7,391/mo. per employee
- Epic: \$2,340 (Blended) + \$3,733 (One) = \$6,073
  - \$1,318 short per employee, each month







### **School Personnel Certification**

Provide contact information. This pers	son should be able to answer questions regarding	the School Personnel Report if necessary.
Person Completing Form:	Josh Brock	
Phone Number (###-###-###):	4057494550	
Email Address:	josh.brock@epiccharterschools.org	
Provide additional contact information	if needed. This person should be able to answer	questions regarding the School Personnel Report if necessa
Person Completing Form:	Ben Wadley	
Phone Number (###-###-###):	4057494550	
Email Address:	ben.wadley@epiccharterschools.org	
		UPDATE

Title 70 � 6-101.6 was signed into law on May 27, 2003. It provides for the inclusion in all contracts and related employee information worksheets for teachers and administrators, clear and concise specific salary and benefit payroll information. The law now requires school districts to report all salary and benefit information to the State Department of Education (SDE) on its Annual Personnel Reports. All Superintendents� salary and fringe benefit information will be compared for accuracy to the contract on file in School Personnel Records (SPR).

The "CERTIFY" buttons shown below are to be used by your Superintendent to certify your reports as accurate and complete. By selecting each "Certify" button, I hereby certify to the best of my knowledge and belief, the data reported constitutes an accurate and full report of all salary and benefit information. I further acknowledge and understand that the responsibility and obligations for ensuring the accuracy and completeness of this information remains my responsibility and I will be held responsible for the accuracy and completeness of this information, certified using my credentials, even if I have authorized another individual to access this information using my credentials. I understand this data will be used for many purposes, including but not limited to reporting to state legislature, USDE, and any penalties in accordance with the applicable statutes. I am aware that any false, fictitious or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraudulent, false statements, false claims or otherwise.

Certified Personnel Report	SDE Approve Reopen
Support Personnel Report	SDE Approve Reopen
Online Directory	SDE Approve Reopen
Salary Schedule	SDE Approve Reopen



# **Federal Programs Monitoring**

- Federal regulations on-site reviews of school districts receiving federal funds
- All districts receiving federal funds are monitored at least once every three years
- Epic Blended (opened in 2018)



## **English Learners**

- Title III of ESSA, Title VI of the Civil Rights Act of 1964
- Department of Education and Department of Justice, Office of Civil Rights
- Identify and serve EL students to ensure meaningful participation and access to educational programs
- Identification
  - 2018-19
    - October 1: 84 students
    - Full Academic Year: 61 students
  - 2019-20 (enrollment 7,700)
    - October 1: 83 students
    - Full Academic Year: 107 students
    - State average: 9%
    - OKCPS / Tulsa PS: 11,000 and 6,420
- Services not reflective of enrollment and instructional operations
  - 21,500 of 23,000 attend full-time virtual
  - LIEP: "mainstream placement," "pull out EL services based on students need"
  - ESL Manager provides material support by "prepare[ing] resources and materials for teachers who have identified Els *in their classroom*" (Emphasis added).



# McKinney-Vento

- Homeless children and youth
- Identification & services
- Epic
  - 17-18: 4 students
  - 18-19: 0 students
  - 19-20: 576







## **Special Education**

- Complaint filed December 9, 2019
- "did not provide instructional time for the majority of the 2018-19 school year"
- Epic policy: "Direct Instruction should total 1 hour a week split among the areas of need for that student. EX: reading, writing, and math would be split by 20 minutes each to equal 1 hr. If there is only one weakness, it will be 60 minutes in that one area."
- Non-compliance with requirements of federal law
- Conduct a review of services for students receiving services and report to OSDE. To date, no report has been provided.



## **Economically Disadvantaged Enrollments**



- Economically Disadvantaged student whose household falls within federal eligibility guidelines in the school year for which the determination is being made - OAC 210:25-3-8
- Weight in the state aid funding formula
- Low-income student counts for each district are used to generate federal funds
- Counts are certified by each district superintendent every year, for the year for which the determination is made



#### ECONOMIC DISADVANTAGED APPLICATION

LIST ALL HOUS	EHOLD MEMBERS					
Names of ALL Household Members (First, Middle Initial, Last)		Name of School for Each Child/Or Indicate <i>NA</i> If Person Is Not in School		Grade Level (If Applicable)	No Income	
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(List only household members with income)	Earnings From Work Before Deductions	Welfare, Child Support, Alimony		Pensions, Retirement, Social Security, SSI, VA Benefits	All Other Incom	
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Annual Income C	onversion: Weekly x 52,	Every 2	Weeks x 26	Twice a Month x 24,	Monthly	y x 12
Income Eligibility						

Total Income: Per: Week Every 2 Weeks Twice a Month Month Year Household Size: Economically Disadvantaged: 130% of Poverty 185% of Poverty No



#### ECONOMIC DISADVANTAGED APPLICATION

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Annual Income Con	nversion: Weekly x 52,	Every 2 V	Weeks x 26	5. Twice a Month x 24,	Monthly	y x 12

Total Income: \_\_\_\_Per: Week \_\_ Every 2 Weeks \_\_ Twice a Month \_\_\_ Month \_\_\_ Year \_\_\_ Household Size: \_\_\_\_ Economically Disadvantaged: 130% of Poverty \_\_\_ 185% of Poverty \_\_\_ No \_\_\_



#### ECONOMIC DISADVANTAGED APPLICATION

Names of ALL Household Members (First, Middle Initial, Last)		Name of School for Each Child/Or Indicate NA If Person Is Not in School		Grade Level (If Applicable)	No Income		
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I certify (promise)	that all information on th	is applicatio	n is true an	d that all income is reported.	160		
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Date: 07/07/2019	)						
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Annual Income C	onversion: Weekly x 52,	Every 2	Weeks x 26	Twice a Month x 24,	Monthly	x 12	
Income Eligibility	**						



# **Economically Disadvantaged - Summary**

- 200 forms reviewed
- 71 of 200 use income of \$22,311
- No welfare
- No alimony
- No child support
- All one income families
- 4 list income as "up" without a numerical value
- 1 without any income or wording identified
- Application submission dates begin February 8, 2019



State Board of Education: Supervision of all schools; state budget, accreditation of schools, apportion state aid to eligible schools, agent/liaison for federal agencies (70 O.S. Sec. 1-105, 3-104)

Charter Sponsor (Authorizer): Contracts with school (terms, enforcement, amendment, term); oversight of school (70 O.S. Sec. 3-145.3; performance review (governing board, academics)

School Board: governing body of the school; responsible for policies and operational decisions of the school, enters contracts, approves finances, employment and OCAS reporting. (70 O.S. Sec. 3-136, 5-117)

School Leadership: This person or team runs the day-to-day operations of the school; hired and reports to school board.

### **Accreditation of Schools**

- Quality standards schools must meet, including compliance with laws and regulations
- State Board adoption, shall provide for warnings, probation or nonacredited status for schools that fail to meet standards
- Must meet all applicable regulations and statutory requirements at the beginning and throughout the year
- Categories
  - No deficiencies
  - Deficiencies
  - Warning
  - Probation
  - Nonaccredited



## Categories

- No deficiencies standards are being met
- Deficiencies site fails to meet one or more standards but does not detract from educational program
- Warning site fails to meet one or more of the standards and deficiency seriously detracts from the quality of the school's educational program
- Probation one or more of the following:
  - Consistently fails to remove or make substantial progress to meeting all deficiencies from prior year
  - Consistently violates regulations; and/or
  - Deliberately and unnecessarily violates one or more of the regulations
- Nonaccredited no longer recognized by the State Board



## **Recent Accreditation Actions**

- 2020
  - Albion Probation
    - administrative costs; audit findings (payroll not supported by employee contracts, purchase orders dated after invoice, purchases not approved by school board); fail to comply with OCAS; federal programs noncompliance
  - Keyes Probation
    - failure to offer required minimum course units or competencies; noncompliance in alternative education
- 2019
  - Seeworth Academy Nonaccredited
    - Noncompliance with Federal Programs and finances.
  - Langston Hughes Academy Probation, then nonaccredit
    - noncompliance with laws and regulations (Open Meetings, special education, school environment)
  - Cave Springs Probation
    - board members have not met required trainings



### Recommendations

- Governing Board:
  - Independent review and assessment of capacity and expertise, taking into consideration current term limits for existing board members, and add membership as needed to allow the board to fulfill its governance duties.
  - Review each contractual agreement for the allocation and sharing of costs and services, and amend as needed to ensure it requires the reporting and accounting of actual costs and expenditures to each separate and distinct entity that is part of the agreement(s).
  - Ensure all personnel have employment agreement. Employment agreements accurately reflect duties, expectations and employing entity.
  - Ensuring compensation and benefits are timely and accurately provided to personnel.
  - If personnel are employed by another school, ensure compliance and awareness of 70 O.S. Sec. 5-106A
- Ensure the uniform reporting of actual costs and expenditures to the OSDE Office of School Personnel Records and OCAS
  - Timely reporting and work with OSDE to ensure this work is done



#### Recommendations

- Financial, purchasing and acquisitions
  - School board to approve all financials (expenditures, encumbrances, purchase orders).
  - Fiscal management plan and designate an Oklahoma State Department of Education (OSDE)-approved independent fiscal agent that reports monthly to the OSBE.
  - Invoices paid shall be itemized, describing the items purchased, the quantity of each item, its unit price, its total cost, and proof of receipt of such goods or services.
  - Discontinue distribution, sharing, loaning or otherwise entanglement of Oklahoma school source funds to support schools and/or entities that manage schools outside of Oklahoma
- Provide and implement all required corrective actions identified in Federal Programs
- Instance of non-compliance may subject status to further change

